

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**MONICA HAGUE,**

**Plaintiff,**

**VS.**

**UNIVERSITY OF TEXAS HEALTH  
SCIENCE CENTER AT SAN ANTONIO,**

**Defendant.**

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**CIVIL ACTION NO.  
SA-11-CA-1101-OG**

**PLAINTIFF'S LIST OF QUESTIONS FOR PROSPECTIVE JURORS**

TO THE HONORABLE ORLANDO GARCIA, UNITED STATES DISTRICT JUDGE:

Pursuant to Local Court Rule CV-16 (e) (1), Plaintiff Monica Hague respectfully requests the Court ask the following questions of prospective jurors in this case:

1. Does any member of the jury panel know the Plaintiff, any of the witnesses for either party, or any of the attorneys for either party? If so, what is the nature of your acquaintance?
2. Have you or any member of your immediate family ever been employed by the University of Texas Health Science Center at San Antonio or the University of Texas System? If so, how were or are you or your family member employed?
3. Have you or any member of your immediate family ever been employed by any governmental entity? If so, how were or are you or your family member employed?
4. Have you or any member of your immediate family ever been employed in a human resources or personnel department or function? If so, how were or are you or your family member employed?

5. Have you or any member of your immediate family ever been a party to a lawsuit?

If so, please answer the following questions:

- (a) Were you the Plaintiff or the Defendant?
- (b) Who was the other party?
- (c) If you were the Plaintiff, what made you decide to sue?
- (d) If you were the Defendant, what do you think made the Plaintiff decide to sue you?
- (e) How long ago did the events made the subject of the lawsuit occur?
- (f) Has the matter been resolved?
- (g) What was the outcome?
- (h) How do you feel about the outcome?
- (i) How did the case affect you?

6. Have you ever been a witness or testified in a legal proceeding? If so, what were the circumstances? How do you feel about that experience?

7. Are you currently employed? What is your job title or position? How long have you held that job?

8. Is your spouse employed? What is his/her job title or position and how long has he/she held that job?

9. Have you or your spouse ever been a supervisor?

10. Have you or your spouse ever been involved in evaluating employees?

11. Have you or your spouse ever disciplined or fired an employee? For what reason(s)?  
Did the employee grieve or complain? What was the result of that grievance or complaint?

12. Have you or anyone you know ever been retaliated against for reporting or complaining about discrimination at work? What form did the retaliation take?

13. Have you or anyone you know ever been accused of retaliating against someone at work? What was the nature of the complaint? What was the result of that complaint?

14. Does any member of the panel believe that discrimination in the workplace is a thing of the past?

15. Do you think that people resort too readily to the courts to resolve their problems? Are you generally suspicious of people who sue?

16. Do you know anyone who has filed a charge of discrimination or a lawsuit claiming that they were discriminated against or retaliated against? Do you believe that that person's charge or lawsuit was warranted? What was the result?

17. The Judge will instruct you in this case that the Plaintiff's burden of proof in this case is to prove her claims of retaliation by a preponderance of the evidence. Will any of you require the Plaintiff, because of the nature of her claims, to prove her claims beyond a reasonable doubt?

18. The Judge will also instruct you that it is permissible for the Plaintiff to prove her claims through circumstantial, as well as direct, evidence. Will any of you not be satisfied with proof of fact by circumstantial evidence?

19. Does any member of the jury panel feel so strongly about an issue that they have placed a decal or sticker on their vehicle? What does the decal or sticker say?

20. Do any of you know of any reason why, if you are chosen as a member of the jury in this case, you could not be fair and impartial to either the Plaintiff or the Defendant?

21. If the Plaintiff wins this case, you will be asked to assess damages to be paid by the Defendant to her. In your opinion, is it appropriate or inappropriate for jurors to decide how much money a successful Plaintiff should be awarded? Are you at all uncomfortable with awarding damages?

22. Is there anything in your life experience or in the life experience of someone you know that has left you with any kind of feeling about the legal profession or about our judicial system?

Respectfully submitted,

LAW OFFICES OF  
GAUL AND DUMONT  
924 Camaron Street  
San Antonio, Texas 78212  
(210) 225-0685  
(210) 320-3445 - Fax

By: **/s/ Malinda A. Gaul**  
MALINDA A. GAUL  
Attorney for Plaintiff  
Texas State Bar No. 08239800

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of September, 2015, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to:

Frank A. King  
Assistant Attorney General  
Texas Attorney General's Office  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548

**/s/ Malinda A. Gaul**  
MALINDA A. GAUL